



**HON. SYLVIA O. HINDS-RADIX**  
*Corporation Counsel*

**THE CITY OF NEW YORK**  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NEW YORK 10007

**JOSEPH M. HIRAOKA, JR.**  
*Senior Counsel*  
[jhiraoaka@law.nyc.gov](mailto:jhiraoaka@law.nyc.gov)  
Phone: (212) 356-2413  
Fax: (212) 356-1148

March 15, 2024

**BY ECF**

Honorable Marcia M. Henry  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Adam White v. The City of New York, et al., 23 CV 6924 (RER)(MMH)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department, representing defendants City of New York, Sergeant Barrett, Sergeant Klenke, Officer Ali, Officer Kaur, Officer Phillips, Officer Rebolledocortes, and Officer Ullah (“City defendants”). I write with the consent of counsel for plaintiff and defendant Klein to respectfully request that City defendants’ time to submit an opposition to plaintiff’s Motion to Compel and for Sanctions be extended from March 19, 2024 to March 21, 2024. This is the first request for an extension of time to submit an opposition, and it will not affect any other deadlines.

City defendants have been working to prepare their opposition. However, the undersigned has been ill since last Tuesday, and has not been able to work at full capacity. The undersigned expects to be able work next week, but is not certain how much he will be able to work. Consequently, City defendants request an extension of time to file an opposition to March 21, 2024.

Thank you for your consideration.

Respectfully submitted,

Joseph M. Hiraoka, Jr.

Joseph M. Hiraoka, Jr.  
Senior Counsel  
Special Federal Litigation Division

cc: All Counsel (by ECF)